

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

<b>NATIONAL GLASS &amp; GATE</b>	:	
<b>SERVICE, INC. d/b/a</b>	:	
<b>NG&amp;G FACILITY SERVICES</b>	:	
<b>INTERNATIONAL, INC.</b>	:	
<b>Plaintiff</b>	:	
	:	
<b>v.</b>	:	<b>C.A. NO: 08-186</b>
	:	
<b>SERVICE EVERYWHERE, L.L.C.</b>	:	
<b>Defendant</b>	:	

**MOTION TO ADJUDGE**  
**DEFENDANT SERVICE EVERYWHERE, L.L.C. IN CONTEMPT**

Plaintiff National Glass & Gate Service, Inc. d/b/a NG&G Facility Services International, Inc. ("NG&G"), files this motion requesting entry of an Order adjudging Defendant Service Everywhere, L.L.C. ("Service") in contempt, compelling Service to produce the documents requested by NG&G, and requiring Service to pay NG&G its costs and attorneys' fees incurred in bringing this motion. NG&G refers to the accompanying memorandum of law in further support of this motion.

Respectfully submitted,

**NATIONAL GLASS & GATE  
SERVICE, INC.**

By /s/ Stacey P. Nakasian  
Stacey P. Nakasian (#5069)  
Duffy & Sweeney, LTD.  
1800 Financial Plaza  
Providence, RI 02903  
(401) 455-0700 – Phone  
(401) 455-0701 – Fax  
[snakasian@duffysweeney.com](mailto:snakasian@duffysweeney.com)

Dated: August 3, 2009

**CERTIFICATE OF SERVICE**

To: Christopher M. Mulhearn, Esq.  
Ferucci Russo, P.C.  
55 Pine Street, Fourth Floor  
Providence, RI 02903  
[cmulhearn@frrlawri.com](mailto:cmulhearn@frrlawri.com)

I hereby certify that the within *Motion to Adjudge Defendant Service Everywhere, L.L.C. in Contempt* was filed through the ECF system on the 3rd day of August, 2009, and will be sent electronically to the above-named counsel who are registered participants identified on the Notice of Electronic Filing.

/s/ Stacey P. Nakasian  
Stacey P. Nakasian